

Fire Training Burn Guidelines

Based on the May 2003 *Dispatcher* article, updated November 2010

When your fire department has the opportunity to conduct a fire training exercise, planning ahead will keep you in compliance with the rules and make the training burn go more smoothly - and safely.

There are 5 steps to a successful fire training exercise. The five steps are: inspect, notify, remove, train and dispose. Give your fire department enough lead time when planning the training exercise as there may be lag time between steps. It may be useful to have a fire training agreement with the home/building owner to define roles and responsibilities. This agreement can also serve as documentation of the process for future reference.

Inspect

Since all asbestos should be removed from a structure before the fire training burn, a state certified asbestos inspector must go through the building and collect samples of all suspect materials – anything that is not wood, metal or glass. The Wisconsin Department of Health Services (DHS) certifies inspectors in Wisconsin. Inspectors are listed at <http://www.dhs.wisconsin.gov/asbestos/AsbCompanies/Companyindex.htm>. Or call the DHS asbestos office at (608) 261-6876 and an employee will fax or e-mail you a current list of inspectors.

Historically, the building owner has hired the asbestos inspector but in some cases it may be the responsibility of the fire department. It might take from a few days to a couple weeks to conduct the inspection, receive sampling results and prepare the report. Homeowners may be able to count the costs associated with preparing for the fire training (inspection and abatement) as a donation to the fire department for tax purposes.

Wisconsin Department of Natural Resources (DNR) rules indicate who must hire (or schedule) the inspector: either the property's owner or its operator. The rules define owner/operator as "any person who owns, leases, operates, controls, or supervises the facility being demolished [burned] & or any person who owns, leases, operates, controls, or supervises the demolition & operation [burn], or both." Fire departments qualify as operators for fire training burns. Some local, regional, and county fire organizations have chosen to send a member to a three-day asbestos inspection training course to have an inhouse inspector. Information on upcoming classes can be found on the DHS web site listed above.

In some counties, local health departments have certified asbestos inspectors available to conduct inspections for fire departments. Either option could save fire departments money when preparing for a fire training exercise.

Notify the DNR

Whether or not the inspector finds asbestos, a fire training notification must be filed with the DNR. Again, the "owner or operator" must do this using the inspection results. The DNR recommends the fire department prepare and submit the notification as the fire training is the notify-able activity. This can be done with DNR's new online Asbestos Renovation and Demolition 2 Notification system or Form 4500-113, Notification of Demolition and/or Renovation and Application for Permit Exemption, can be found on DNR's [asbestos web page](#).

A one-time registration is required to use the system. The registration ID acts as an "electronic signature" when submitting the notification. Notifying online allows for making easy changes to dates and other information if necessary. For a fire training exercise, the fire department is the demolition contractor. To identify the dates of the renovation/ demolition, indicate the scheduled date of the fire training burn; a range of dates up to a month or two long is acceptable as the burn is dependent on weather and other factors. Note that the start date of the fire training may not be prior to asbestos abatement or less than 10 working days after submittal of the notification.

If using [Form 4500-113, Notification of Demolition and/or Renovation and Application for Permit Exemption](#) to notify, a copy must be mailed in, (not faxed) to the DNR central office in Madison with the notification fee.

As of January 1, 2011, notification fees for stand-alone, single family residential structures are \$100. Any other structures require a notification fee of \$135 (and up to \$1325 for large amounts of asbestos), due with notification.

Be sure to give the DNR Asbestos Coordinator a "heads up" phone call at (608) 266-3658 the day before the actual training day.

Removal of Asbestos and Hazardous Materials

Certified asbestos workers must be used to remove asbestos containing materials from the structure in all cases, except when the training structure is an isolated, single family, owner-occupied house. In this case, the homeowner can choose to remove the asbestos themselves without an asbestos abatement license. The homeowner may also choose to hire an asbestos abatement contractor. Fire departments may not perform asbestos removal in any structure, even if they have taken title to the property, as the exemption for certification only applies to owner-occupied single family homes. Structures, other than single family homes, such as commercial, educational, industrial, and duplexes or other multi-family dwelling units must always have certified asbestos professionals conduct the abatement. The DHS web site lists abatement companies with certified workers.

According to the DNR Waste Regulations, other hazardous materials must be removed before the structure is burned. Things that should be removed prior to the burn include but are not limited to vinyl siding, furniture, appliances, house hold chemicals and tires. The DNR also recommends asphalt roofing be removed before the burn, unless removal would cause structural damage from weather conditions.

Training and NFPA regulations

National Fire Protection Association (NFPA) rules reinforce the thrust of the state's rules. NFPA regulation 1403, "Standard On Live Fire Training Evolutions," Section 2-2.2, requires "permits required for the exercise, including permits for air quality be researched thoroughly." Also, NFPA 1403 2-2.10(j) states, "All forms of asbestos deemed hazardous to personnel shall be removed by an approved asbestos removal contractor."

Fire training versus open burning

Fire training burns may only be conducted on a standing structure that offers some interior training value. Buildings may not be burned for the sole purpose of waste reduction, nor may they be burned by an entity other than a fire department. Open burning is strictly regulated by the state and usually by local governments as well.

Disposal

Once the training burn is complete, the cold fire training ash, brick, concrete, pavement and stone may be buried on-site, although DNR recommends the ash be taken to a state-licensed landfill for disposal. In addition, any other debris must be disposed of at a [state-licensed landfill](#).

Why asbestos is regulated?

Asbestos is regulated because it is a known human carcinogen and a cause of respiratory disease. There are no known safe levels of asbestos exposure.

Most forms of asbestos burn at 2,732 degrees F (1,500 degrees C). Therefore, asbestos will not burn during a training burn. If asbestos is not properly removed before the fire, some of it will contaminate the air and some of it will remain in the ash resulting from the fire. Asbestos is divided into two categories: friable and non-friable. Friable means it crumbles when hand pressure is applied. Non-friable materials are further separated by whether or not they are resilient and pliable or rigid and brittle, and by whether they have the potential to become friable. **In a fire, most materials that contain asbestos would combust, rendering the asbestos fiber content friable and causing it to release into the air.**

Asbestos is found on and in boilers, heaters, piping, electrical equipment, flooring, ceiling tiles, plasters and water heaters. It is also found in range hoods, roofing, siding, and many other building materials- over 3000 building materials.

A popular misconception is that asbestos is not used in new construction. Actually, asbestos containing materials are still manufactured in the U.S., and they are imported, though not always labeled.

Where can I find the DNR rules?

The two state agencies responsible for regulating fire training burns are the DNR and the DHS. Within the DNR, training burns are covered under language for "intentional burning" at NR 447, Control of Asbestos Emissions on the Asbestos Program web page identified earlier in this guidance document. DHS regulates the certification of asbestos professionals.

This guidance does not account for County and Local ordinances on burning. If you have questions, contact the DNR's Asbestos Coordinator at 608-266-3658.

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